

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
KNEPPER & CLARK LLC
10040 W. Cheyenne Ave., Suite 170-109
Las Vegas, NV 89129
Phone: (702) 825-6060
Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROBERT D. DEY,

Plaintiff,

vs.

EXPERIAN INFORMATION SOLUTIONS,
INC.; DITECH FINANCIAL, LLC; and
TRANS UNION LLC,

Defendant.

Case No.: 2:18-cv-00502-RFB-CWH

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO MOTION TO DISMISS**

[SECOND REQUEST]

Plaintiff Robert D. Dey ("Plaintiff"), by and through his counsel of record, and Trans Union LLC ("Trans Union") have agreed and stipulated to the following:

1. On March 19, 2018, Plaintiff filed a Complaint [ECF Dkt. 1].

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS
[SECOND REQUEST] - 1

1 2. On May 11, 2018, Trans Union filed a Motion to Dismiss the Complaint [ECF Dkt.
2 12].

3 3. On May 25, 2018, Plaintiff filed an Amended Complaint [ECF Dkt. 17].

4 4. On June 4, 2018 Trans Union filed a Motion to Dismiss the Amended Complaint
5 [ECF Dkt. 19].
6

7 5. On June 18, 2018, the Court granted the parties' first stipulation for extension of
8 time. ECF Dkt. 24.

9 6. Plaintiff's Response is due July 9, 2018.

10 7. Plaintiff and Trans Union have agreed to extend Plaintiff's response an additional
11 fourteen days in order to allow the parties to further discuss possible resolution of this matter.
12 Given the intervening Fourth of July holiday, it may not be possible to conclude negotiations prior
13 to the time the response is due on July 9. As a result, both Plaintiff and Trans Union hereby request
14 this Court to further extend the date for Plaintiff to respond to Trans Union's Motion to Dismiss
15 Complaint until **July 23, 2018**. This is the second request for seeking an extension, and
16

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO MOTION TO DISMISS
27 [SECOND REQUEST] - 2
28

is not made for purposes of delay.

IT IS SO STIPULATED.

July 2, 2018.

KNEPPER & CLARK LLC

/s/ Miles N. Clark

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
10040 W. Cheyenne Ave., Suite 170-109
Las Vegas, NV 89129
matthew.knepper@knepperclark.com
miles.clark@knepperclark.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Avenue, Suite 350
Henderson, NV 89123
dkrieger@hainesandkrieger.com
Counsel for Plaintiff

NAYLOR & BRASTER

/s/ Andrew J. Sharples

Jennifer L. Braster, Esq.
Nevada Bar No. 9982
Andrew J. Sharples, Esq.
Nevada Bar No. 12866
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145
Email: jbraster@nblawnv.com
Email: assharples@nblawnv.com
Counsel for Defendant
Experian Information Solutions, Inc.

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Jason Revzin

Jason Revzin, Esq.
Nevada Bar No.
6385 S. Rainbow Blvd., Suite 600
Las Vegas, NV 89118
Email: jason.revzin@lewisbrisbois.com
Counsel for Defendant Trans Union LLC

WOLFE & WYMAN LLP

/s/ Andrew S. Bao

Andrew A. Bao, Esq.
Nevada Bar No. 10508
6757 Spencer Street
Las Vegas, NV 89119
Email: aabao@wolfewyman.com
Counsel for Defendant Ditech Financial, LLC

IT IS SO ORDERED.

ORDER



RICHARD F. BOULWARE, II
United States District Court

Dated: July 5, 2018.